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*Attorneys for Plaintiff Edward Rossi and  
the Class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

EDWARD ROSSI, individually and on behalf  
of all others similarly situated,  
Plaintiffs,

vs.

THE PROCTER & GAMBLE COMPANY,  
Defendants.

Civil Action No. 11-7238 (JLL)(MAH)

**NOTICE OF MOTION**

To: All Persons on ECF Service List

PLEASE TAKE NOTICE that, on Monday, April 7, 2014 at 10:00 a.m. or as soon thereafter as counsel may be heard, Class Counsel, on behalf of Plaintiff Edward Rossi and the Class, shall move before the Hon. Jose L. Linares, U.S.D.J. in Courtroom 5D at the Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for entry of an Order for sanctions pursuant to Fed.R.Civ.P. 11.

The undersigned intends to rely upon the annexed Declaration of James E. Cecchi and Brief.

The undersigned hereby requests oral argument.

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.  
*Attorneys for Plaintiff*  
*Edward Rossi and the Class*

By: /s/ James E. Cecchi  
JAMES E. CECCHI

Dated: February 4, 2014

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